

## **MANAGEMENT (MNG)**

### **OBJECTIVE**

**MNG.1** A feedback and improvement process has been established to identify, evaluate, and resolve deficiencies and recommendations made by independent review groups, official review teams, audit organizations, and the operating contractor (e.g., DOE Policy 450.5). (CR-15)

**Scope:** Implementation of the deficiency identification, review, and tracking systems for the SWS will be evaluated.

### **Criteria**

- A system for identifying, reviewing, cataloging, and resolving deficiencies and recommendations is adequately implemented. (DOE Order 414.1A, Criterion 3; 10 CFR 830, Subpart A)

### **Approach**

#### Record Review

- Review the SWS issues management systems and programs, selecting representative issues and assessing the adequacy of the programs. Assess the backlog and the prioritization system for reducing it.
- Select a recent assessment to evaluate if issues were processed through the process (what process?).
- Review open items in tracking system(s) used to resolve deficiencies, other tracking systems identified by SNF Project management, open occurrence reports, nonconformance reports, and open employee concerns related to the SWS to ensure those items will not affect safe operation of the SWS.
- Review the contractor ORR report and the MSA for this CRAD, adjust the approach accordingly, and provide input to CRAD-17 write-up.

#### Interviews

- Interview appropriate managers to determine if they are knowledgeable of the corrective action management process and are aware of any significant items remaining to be completed before startup.

- Interview personnel who implement the corrective action management process to determine if they are knowledgeable of the process and how issues are identified and resolved.

#### Shift Performance

- If conducted during the review, evaluate any meetings related to event investigations, critiques, root cause analysis, issue management, or corrective action management to determine if the process is adequately implemented.

### **OBJECTIVE**

**MNG.2** Functions, assignments, responsibilities, and reporting relationships (including those between the line operating organization and ES&H support organizations) are clearly defined, understood, and effectively implemented with line management responsibility for control of safety. (CR-2)

**Scope:** Roles and responsibilities for the K Basins SWS and the interface for transportation and storage are defined and understood by impacted personnel.

#### **Criteria**

- A clear management structure for the SWS is established, approved, and in place. This structure is implemented and is understood by operations and support personnel. (DOE Order 5480.19, Chapter I; HNF-MP-003)
- The SWS's roles and responsibilities for interface with the Waste Management Project are established.

#### **Approach** Record Review

- Review selected facility documents (including the authorization basis documents and MOA with the Waste Management Project) to determine if they adequately define the functions, assignments, responsibilities, and reporting relationships.
- Review selected implementing administrative, operations, and support program implementation procedures to determine that roles and responsibilities are clearly defined.
- Review contractor ORR report and the MSA for this CRAD, adjust the approach accordingly, and provide input to CRAD-17 write-up.
- Review the FTS ORR report for related issues.

#### Interviews

- Interview managers and operations and support personnel to assess their understanding and implementation of the management structure that is in place.
- Interview managers and operations and support personnel to determine they understand their roles, responsibilities, and reporting relationships.

#### Shift Performance

- Ensure that clear roles and responsibilities are evident during observations of activities.

### **OBJECTIVE**

**MNG.3** An adequate startup or restart program has been developed that includes plans for graded operations and testing after startup or resumption to simultaneously confirm the operability of equipment, the viability of procedures, and the performance and knowledge of the operators. The plans should indicate validation processes for equipment, procedures, and operators after startup or resumption of operations including any required restrictions and additional oversight. Also, the breadth, depth, and results of the responsible contractor ORR are adequate to verify the readiness of hardware, personnel, and management programs for operations. (CR 12 and CR 17)

**Scope:** A plan for the SWS that addresses equipment operability, procedure viability, and the performance and knowledge of the operators (transition from “declaration of readiness” to “full unrestricted” operations) is within the scope of this ORR.

#### **Criteria**

- The SWS startup plan is adequate, is being implemented, and is on schedule to support safe startup. Specific hazards and evaluations that cannot be addressed prior to commencement of operations are included. (DOE Order 425.1C)
- The contractor ORR was performed to the breadth and depth to support safe operations. (DOE Order 425.1C, Section 4.d.17)
- The contractor ORR was performed in accordance with the approved POA and IP. (DOE Order 425.1C, Section CRD 2(5))

## Approach

### Record Review

- Evaluate the status of actions under the SWS startup plan and assure that it includes a phased approach to normal operations, as well as including procedures, operator qualification, and equipment startup testing, as required. Verify the plan includes mechanisms to deal with specific hazards.
- Review the documentation of test results and resolution of open items for a sampling of tests of SWS systems and components.
- Team members, in the review of their core requirements, will assess the adequacy of the contractor ORR record reviews, and upon review completion, will provide to the MNG 3 assignee their conclusion as to the adequacy of the review. Objective evidence of inadequacy will be provided.
- Evaluate contractor ORR final report to ensure ORR was performed in accordance with the approved POA and IP.
- Evaluate contractor POA and IP to ensure criteria defined were adequate to demonstrate that the core requirements were met.
- Evaluate the process used to implement the “operational pause” and re-start the contractor ORR.

### Interviews

- Interview facility management to ensure the startup plan addresses all necessary actions to support SWS startup and that the process used to prepare the plan was adequate.
- Interview facility technical staff to determine that adequate SWS testing was performed or will be completed during startup to demonstrate operability over the full range of required operations.
- Each team member in the review of their core requirements will assess the adequacy of the contractor ORR observations of shift performance, and upon completion of the review, will provide to the team leader their conclusion as to the adequacy of the review.

### Shift Performance

- Verify that the SWS startup plan is adequate based on observations of operations.

- Determine if the startup process is adequately implemented.

